# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

LORDSTOWN MOTORS CORP., et al.,1

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

Joint Administration Pending

## NOTICE OF ENTRY OF APPEARANCE AND DEMAND FOR NOTICES AND PAPERS

PLEASE TAKE NOTICE that Seyfarth Shaw LLP and Chipman Brown Cicero & Cole, LLP hereby appear in the above-captioned matter as counsel to Karma Automotive LLC, a California limited liability company ("Karma"), and, pursuant to Rules 2002, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure and 11 U.S.C. §§ 102(1), 342 and 1109(b), request that all notices given or required to be given in these cases or any related adversary proceeding and all papers served or required to be served in these cases be given and served upon:

### SEYFARTH SHAW LLP

Michael D. Wexler James B. Sowka 233 South Wacker Drive, Suite 8000 Chicago, IL 60606-6448

Telephone: (312) 460-5000 Email: <a href="mailto:mwexler@seyfarth.com">mwexler@seyfarth.com</a> jsowka@seyfarth.com

#### SEYFARTH SHAW LLP

Jesse M. Coleman 700 Milam Street, Suite 1400 Houston, TX 77002-2797 Telephone: (713) 225-2300

Email: jmcoleman@seyfarth.com

The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors' service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

CHIPMAN BROWN CICERO

& COLE, LLP

William E. Chipman, Jr.

Mark D. Olivere

Hercules Plaza

1313 North Market Street, Suite 5400

Wilmington, DE 19801

Telephone: (302) 295-0191

Email: chipman@chipmanbrown.com

olivere@chipmanbrown.com

PLEASE TAKE FURTHER NOTICE that this request for notice and service includes copies

of all papers, including, but not limited to, reports, pleadings, motions, applications or petitions,

schedules, plans, disclosure statements, and answering or reply papers filed in these cases or any

related adversary proceeding. Such service shall be by mailing one copy of each paper, unless

otherwise directed by the Court, to the parties listed above.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any former or

later pleading, claim or suit shall waive (1) the Karma's right to have final orders in non-core

matters entered only after de novo review by the United States District Court for the District of

Delaware (the "District Court"), (2) Karma's right to trial by jury in any proceeding so triable in

these cases or any case, controversy or proceeding related to these cases, (3) Karma's right to have

the District Court withdraw the reference in any matter subject to mandatory or discretionary

withdrawal or (4) any other rights, claims, actions, defenses, set-offs, or recoupments to which

Karma or may be entitled under agreements in law or in equity.

- 2 -00039839.1

Dated: June 27, 2023

Wilmington, Delaware

## CHIPMAN BROWN CICERO & COLE, LLP

/s/ William E. Chipman Jr.

William E. Chipman, Jr. (No. 3818)

Mark D. Olivere (No. 4291)

Hercules Plaza

1313 North Market Street, Suite 5400

Wilmington, Delaware 19801 Telephone: (302) 295-0191

Email: <u>chipman@chipmanbrown.com</u>

olivere@chipmanbrown.com

Counsel to Karma Automotive LLC

00039839.1